

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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VLADIMIR GOLDSHTEYN, individually and on	)	
behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	No. 10 cv 5402
	)	
v.	)	Judge Der-Yeghiayan
	)	
ARGONNE CREDIT UNION,	)	Magistrate Judge Dolan
	)	
Defendant.	)	

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**DEFENDANT ARGONNE CREDIT UNION’S UNOPPOSED MOTION FOR AN  
ENLARGEMENT OF TIME TO ANSWER THE PLAINTIFF’S COMPLAINT**

Defendant Argonne Credit Union (“Argonne”), by their attorneys Gonzalez, Saggio & Harlan, L.L.P., respectfully move the Court for an order granting Argonne a two-week extension from September 21, 2010 to October 5, 2010 in which to file their responsive pleading in this action. The grounds for this motion are as follows:

1. Plaintiff’s complaint was served on Argonne on October 31, 2010;
2. Argonne requires additional time to finalize its investigation into the plaintiff’s allegations that its automated teller machines were not in compliance with the requirements of the Electronic Funds Transfer Act, 15 U.S.C. 601, *et seq*;
3. The parties have agreed to hold a 26(f) conference one day after the proposed enlargement, on October 6, 2010;
4. The requested extension will not interfere with either the parties’ reporting deadlines or the Court’s initial conference scheduled for October 26, 2010;

5. We have discussed this motion with opposing party and are authorized to state that they are not in opposition to Argonne's Motion.

WHEREFORE, Defendant Argonne Credit Union respectfully request that this Honorable Court issue an order granting Argonne Credit Union an additional two weeks to answer the plaintiff's complaint, until October 5, 2010.

Respectfully submitted this 21st day of September, 2010.

GONZALEZ, SAGGIO & HARLAN, L.L.P.  
Attorneys for Defendant Argonne Credit  
Union

/s/Joshua F. Stubbins

Joshua F. Stubbins, Bar # 1062970